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Attorneys for Plaintiff
RONALD CUPP

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION

RONALD CUPP, an individual,

Plaintiff,

vs.

COUNTY OF SONOMA, a municipal
corporation; TENNIS WICK, in his
individual and official capacities; TYRA
HARRINGTON, in her individual and official
capacities; MARK FRANCESCHI, in his
individual and official capacities; TODD
HOFFMAN, in his individual and official
capacities; JESSE CABLK, in his individual
and official capacities; ANDREW SMITH, in
his individual and official capacities; and
DOES 1-50, inclusive.

Defendants.

CASE NO.: 4:23-cv-01007-JST

**STIPULATION OF PARTIES TO
EXTEND TIME FOR FILING
OPPOSITION TO MOTION TO
DISMISS COMPLAINT AND
REPLY TO OPPOSITION TO
MOTION TO DISMISS
COMPLAINT**

Date: August 17, 2023
Time: 2:00 p.m.
Courtroom: 6, 2nd Floor
Judge: Jon S. Tigar

IT IS STIPULATED AND AGREED, by and between the parties, through their respective
counsel, to request that the Court extend the time for filing Plaintiff RONALD CUPP's
opposition and response to the Motion to Dismiss Complaint (DOC 28) filed by Defendants
TENNIS WICK, TYRA HARRINGTON, MARK FRANCESCHI, TODD HOFFMAN, JESSE
CABLK, and ANDREW SMITH ("Defendants") up to and including 5:00 p.m. on June 1, 2023.

**STIPULATION OF PARTIES TO EXTEND TIME FOR FILING OPPOSITION TO
MOTION TO DISMISS COMPLAINT AND REPLY TO OPPOSITION TO MOTION TO
DISMISS COMPLAINT**

1 This short extension is respectfully requested due to Plaintiff's counsel's trial and deposition
2 schedule, which has been delayed and interfered with counsel's ability to complete Plaintiff's
3 opposition and response to Defendant's Motion to Dismiss. In addition, Plaintiff's counsel has
4 an extensive filing in a complex medical malpractice matter that is due on May 31, 2023, which
5 has interfered with counsel's ability to complete the opposition in this matter by May 30, 2023.
6

7 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, through
8 their respective counsel, to respectfully request that the Court also extend the time for filing
9 Defendants' reply papers in support of the Motion to Dismiss Complaint by an additional two
10 (2) court days.
11

12 **IT IS SO STIPULATED.**

13 Respectfully submitted,

14 Dated: May 30, 2023

YOUNG LAW GROUP

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16 By: /s/Eric G. Young, Esq.
17 ERIC G. YOUNG, ESQ., Attorneys for
18 Plaintiff RONALD CUPP

19 Dated: May 30, 2023

ROBERT H. PITMANN, County Counsel

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22 By: /s/Joshua A. Myers, Esq.
23 Joshua A. Myers
24 Chief Deputy County Counsel
25 Attorneys for Defendant COUNTY OF
26 SONOMA
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STIPULATION OF PARTIES TO EXTEND TIME FOR FILING OPPOSITION TO
MOTION TO DISMISS COMPLAINT AND REPLY TO OPPOSITION TO MOTION TO
DISMISS COMPLAINT

[PROPOSED] ORDER

Pursuant to the Stipulation of the parties, it is hereby ordered that Plaintiff RONALD CUPP's time for filing opposition and response papers to Defendants TENNIS WICK, TYRA HARRINGTON, MARK FRANCESCHI, TODD HOFFMAN, JESSE CABLK, and ANDREW SMITH's Motion to Dismiss Complaint (DOC 28) is extended to June 1, 2023 by 5:00 p.m. Defendants TENNIS WICK, TYRA HARRINGTON, MARK FRANCESCHI, TODD HOFFMAN, JESSE CABLK, and ANDREW SMITH's time for filing any reply papers in support of the Motion to Dismiss Complaint is also extended an additional two court days by 5:00 p.m.

Dated: _____

HON. JON S. TIGAR
U.S. District Court Judge
Northern District Court of California

STIPULATION OF PARTIES TO EXTEND TIME FOR FILING OPPOSITION TO
MOTION TO DISMISS COMPLAINT AND REPLY TO OPPOSITION TO MOTION TO
DISMISS COMPLAINT